

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

SHYANDREA HESTER and MARY
HESTER,

Plaintiffs,

v.

LOWNDES COUNTY COMMISSION,
CHRISTOPHER BROWN,
EMERGYSTAT, DEPUTY JIMMY
HARRIS, et al.,

Defendants.

CIVIL ACTION NO.:
CV-06-572-WHA

NOTICE TO TAKE DEPOSITION

TO: Tyrone Townsend, Esq.
P.O. Box 2105
Birmingham, Alabama 35201

Please take notice that the defendants, **Christopher Brown and Emergystat**, in the above styled cause will take the deposition of **Donald Richardson**, upon oral examination, on **May 17, 2007, at 1:00 p.m.** at the offices of **Celeste P. Holpp, Esq., Norman, Wood, Kendrick & Turner, Financial Center - 505 20th Street North, Birmingham, Alabama 35203**, under the Alabama Rules of Civil Procedure, for the purpose of discovery or for use as evidence in the action, or for both purposes, before a court reporter, a notary public, or before some other office authorized by law to administer oaths. The oral examination will continue until completed.

REQUEST FOR DOCUMENTS

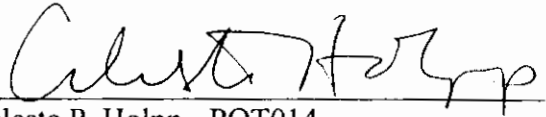
"Document" shall be defined as any writings, drawings, graphs, charts, photographs, phone-records, tape recordings, computer disks, computer printouts, other data compilations



from which information can be obtained by the respondent through detection devices into reasonably usable form, books, treatises, articles, papers, tangible things, memorandums, notes, or published standards, regulations, or recommendations.

1. Current curriculum vitae and bibliography.
2. Any and all documents, books, treatises, articles, publications, standards, or regulations which you have reviewed in connection with this case or involving the subject matter of this case.
3. Any and all documents, books, treatises, articles, publications, standards, or regulations upon which you rely in forming the opinions and conclusions about which you are expected to testify in this case.
4. Any and all documents provided to you by the Plaintiffs' attorney or on behalf of the Plaintiffs in connection with this case or involving the subject matter of this case.
5. Any and all documents, files, notes, memoranda, or correspondence which in any way concern this case or the subject matter of this case.
6. Any report or other compilation of information which you have prepared concerning this case or the subject matter of this case, whether written, taped, stored on computer disk, or memorialized in any other medium.
7. A list of each and every case, claim, or matter on which you have consulted with an attorney; testified, either in court or by deposition; or rendered an opinion to an attorney; stating the name of the case, claim, or matter; the nature of the case; the court; the case number; the date you were consulted; the nature of the alleged defective condition of a product, if applicable; or the alleged acts or omissions which constituted negligence, if applicable; and the amount of money you received for your services.
8. If no such list as described in #7 above exists, please produce any and all documents from which this information can be compiled.
9. Any and all documents which reflect the amount of money you have received from consulting with attorneys, testifying either in court or by deposition; or rendering opinions to attorneys.
10. Any and all documents which reflect the amount of money you have received from consulting with, testifying for, or rendering opinions to Townsend & Associates, LLC.
11. Any and all documents, books, treatises, articles, publications, standards or regulations of which you are aware which do not support or any such documents which contradict the opinions and conclusions about which you are expected to testify in this case.

12. Any and all documents, contracts, or agreements which in any way refer to your association with expert consulting services, organizations which provide expert witnesses, organizations which refer health care providers to lawyers for the purpose of expert testimony, such as Expert Net, JD-MD, TASA, etc.



Celeste P. Holpp - POT014
Attorney for Defendants

Of Counsel:

NORMAN, WOOD, KENDRICK & TURNER
Financial Center - Suite 1600
505 20th Street North
Birmingham, Alabama 35203
Tele: (205) 328-6643
Fax: (205) 251-5479
Email: cholpp@nwkt.com

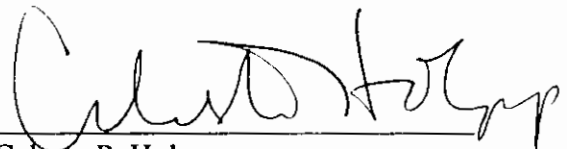
CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document on all counsel of record by placing a copy of same in the U.S. mail, postage prepaid and properly addressed on this the 7th day of May, 2007, as follows:

Tyrone Townsend, Esq.
P.O. Box 2105
Birmingham, Alabama 35201

James Earl Finley, Esq.
P.O. Box 91
Trussville, Alabama 35173

Ms. Deena Wright or an Authorized Representative of
National Court Reporting
367 Valley Avenue
Birmingham, Alabama 35209



Celeste P. Holpp